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JAN 28 2006

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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 05-22285 CIV GOLD

GUSTAVO A. MORALES,

Plaintiff,

vs.

CITIGROUP, INC. f/k/a
THE NATIONAL CITY BANK OF NEW YORK,

Defendant.

**PLAINTIFF, GUSTAVO A. MORALES', RESPONSE TO CITIGROUP'S
MOTION TO TRANSFER VENUE**

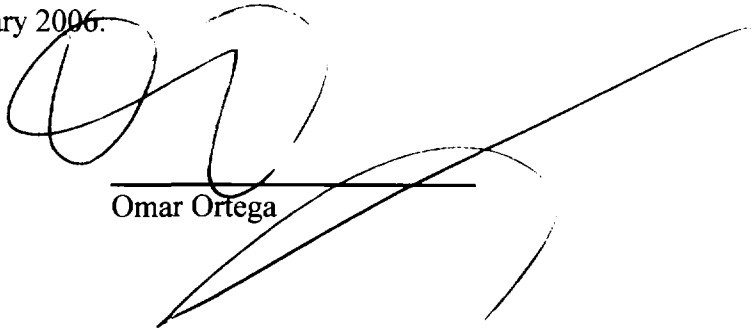
Plaintiff, Gustavo A. Morales (hereinafter "Morales"), pursuant to 28 U.S.C. § 1404(a) requests this court to deny Defendant Citigroup's Motion to Transfer Venue to the Southern District of New York. Defendant's Motion should be denied for the reasons set forth in the accompanying Memorandum of Law in Support of Plaintiff, Gustavo A. Morales', Response to Citigroup's Motion to Transfer Venue.

Respectfully submitted,

DORTA & ORTEGA, P.A.
2222 Ponce de Leon Blvd., Suite 306
Omar Ortega
Fla. Bar. No. 0095117
Coral Gables, Florida 33134
Telephone: (305) 461-5454
Facsimile: (305) 461-5226
E-mail: ortegalaw@bellsouth.net

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed to Elena M. Marlow, Astigarrga Davis Mullins and Grossman, P.A., 701 Brickell Avenue, 16th Floor, Miami, Florida 33131 this 20th day of January 2006.



Omar Ortega